



Structural Engineers of New Hampshire, P.O. Box 226, Manchester, NH 03105 - www.senh.org

February 4, 2026

New Hampshire House of Representatives
Resources, Recreation and Development Committee
Chairman: Representative Robert Harb
Granite Place Room 228
Concord, NH 03301

RE: House Bill 1204, Relative to the Grading and Use of Timber Grown in New Hampshire

Chairman Harb and Members of the Resources, Recreation and Development Committee

The Board of Directors of the Structural Engineers of New Hampshire (SENH) has reviewed the text of Senate Bill 503 alongside experts including the Northeast Lumber Manufacturer's Association (NELMA), the American Lumber Standards Committee (ALSC), and the American Wood Council (AWC). We understand that the intent of the bill is to promote the use of New Hampshire harvested lumber for New Hampshire building projects. However, SENH opposes this legislation because it contradicts US Department of Commerce grading standards and it circumvents the NH State Building Code. We offer the following:

1. Spruce-Pine-Fir-South is, by grading standards definition, made from various species of trees harvested anywhere in the United States. Spruce-Pine-Fir is made from various species of trees harvested in Canada. These definitions are agreed upon by the ALSC, which guides the lumber standards published by the US Department of Commerce.
2. While there is some correlation between geography and density and strength of the species of lumber in these groups, lumber cannot solely be graded by its geography.
3. We understand the unfortunate reality that lumber harvested in New Hampshire theoretically of the same species and density as lumber harvested nearby in Canada is graded with lower strength values. The grading rules that result in this variation are embedded in Federal standards and the Building Codes that govern building design and construction. The grading rules are such that the groups use different "recipes" Spruce-Fine-Fir-South group includes different species with lower strength and a different mix of species common to both grades, leading to lower design values for the Spruce-Pine-Fir-South group. We refer to experts like NELMA and ALSC to provide more background and details on these lumber grading processes. The bill as written does not take all of this into account. The result of this bill would be the assignment of design values to a mix of lumber species that has not been proven by test data and reduces building safety.
4. We believe that the correct way to liken US-grown and Canadian-grown lumber that is otherwise similar is to pursue a change in grading rules with the ALSC.



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5. SENH supports legislative proposals that give preference to US and NH-grown lumber used for public building projects, so long as the law is clearly written and is congruent with the NH State Building Code. Engineers can properly and safely utilize Spruce-Pine-Fir-South in their designs and may be motivated to do so if the benefits of its use (such as lower cost, local economic impact, and reduction in fossil fuel emissions from trucking) are understood.
6. To promote the use of Spruce-Pine-Fir-South, the NH State Building Code could be amended in ways such as including the Spruce-Pine-Fir-South species group in the prescriptive tables for roof joists, floor joists, and wall studs. There are other paths, such as mechanically grading lumber to define its strength.
7. If the Spruce-Pine-Fir-South lumber is believed to be superior in the NH region then this can be proven out and lumber may be designed higher design values under the current Machine Graded Lumber policy of ALSC. This is the correct and safe way to get the best design values out of a localized group of lumber.

Spruce-Pine-Fir and Spruce-Pine-Fir-South are not the same. Equating them, as this legislation proposes, is technically incorrect and potentially unsafe. We therefore oppose the legislation as currently written.

We understand this topic has been important and pursued by the proponents for many years. Efforts to promote the use of New Hampshire-harvested lumber like HB1204 have been presented to us, but equating the groups is not negotiable. We suggest that builders, engineers, material suppliers, harvesters, and any other interested parties work together to develop solutions that are agreeable to all.

If the committee has any follow up questions or wishes to discuss this further, please do not hesitate to contact me.

Sincerely,

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